51-107-00101
Natalia Vasq

Dominion Energy Services, Inc.
5000 Dominion Boulevard
Glen Allen, VA 23060
DominionEnergy.com

Dominion Energy®

October 30, 2019

U.S. MAIL, RETURN RECEIPT REQUESTED
7018 1830 0000 9608 8355

U.S. EPA Region III
Director, Air Protection Division
Mail Code 3WC22
1650 Arch Street
Philadelphia, PA 19103-2029

U.S. MAIL, RETURN RECEIPT REQUESTED
7018 1830 0000 9608 8362

R. David Hartshorn
Air Compliance Manager
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193-1453

Re: Dominion Energy Transmission, Inc. – Leesburg Compressor Station
NSPS OOOOa – Annual Report

Dear Sirs and/or Madam:

Dominion Energy Transmission, Inc. (DETI) owns and operates the Leesburg Compressor Station, located in Leesburg, Virginia and is subject to 40 CFR 60, Subpart OOOOa, Standards of Performance for Crude Oil, and Natural Gas Facilities.

In accordance with 40 CFR 60.5420a(b), DETI is submitting the annual report for the Leesburg Compressor Station covering the time period of August 2, 2018 thru August 1, 2019. The affected facility at the Leesburg Compressor Station subject to 40 CFR 60, Subpart OOOOa is the collection of fugitive emission components at the compressor station.

This annual report is being submitted according to the requirements specified in §60.5420a (b) and includes the following:

1. Attachment A: Certification by Certifying Official
2. Attachment B: General Site Information
3. Attachment C: Annual Fugitive Emissions Monitoring Report

If you have any questions regarding this submittal, please contact Sean Warden at (804) 273-3263, or via email at Richard.S.Warden@dominionenergy.com.

Sincerely,

Thomas N. Effinger
Director, Environmental Services

Enclosures

Attachment A

Certification by Certifying Official

VIRGINIA CERTIFICATE OF DATA ACCURACY

Annual Report - OOOOa
October 30, 2019
Leesburg Compressor Station

Company Name: **Dominion Energy Transmission, Inc.**
Facility Name: **Leesburg Compressor Station**
Facility Address: **40620 Consolidate Lane**
Leesburg, Virginia 20175

Permit Number: NRO71978

Federal Tax ID – Plant Code: 51-107-01016

I, John M. Lamb, certify under penalty of law that I am a company officer or plant manager or authorized representative of the facility identified above, authorized to make this affidavit. I further certify, as required under 9 VAC 5-20-230 that, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete.

Signature: _____

John M. Lamb
VP, Eastern Pipeline Operations

Date: 10/29/19

Attachment B

General Site Information

Dominion Energy Transmission, Inc.
Leesburg Compressor Station
2019 Annual Report
General Site Information

SITE INFORMATION	Company Name (§60.5420a(b)(1)(i))	Dominion Energy Transmission, Inc.
	Facility Site Name (§60.5420a(b)(1)(i))	Leesburg Compressor Station
	Address of Affected Facility (§60.5420a(b)(1)(i))	40620 Consoldated Lane
	City	Leesburg
	County	Loudoun
	State Abbreviation	VA
	Zip Code	20175
Identification of Affected Facility(s)	Identification of each affected facility being included in the annual report. (§60.5420a(b)(1)(ii))	1. Collection of fugitive emission components at the compressor station
REPORTING INFORMATION	Beginning Date of Reporting Period. (§60.5420a(b)(1)(iii))	08/02/18
	Ending Date of Reporting Period. (§60.5420a(b)(1)(iii))	08/01/19
Certification Official	Name and title of certifying official (§60.5420a(b)(1)(iv))	John Lamb / VP Eastern Pipeline Operations (Certification in Attachment A)

Attachment C

Annual Fugitive Emissions Monitoring Report

TARGET
EMISSION SERVICES

LDAR Report

Dominion

Leesburg - LDAR

Annual Report

NSPS Subpart OOOOa

PERIOD: 8/2018 - 8/2019

Prepared By:

Target Emission Services

800 Town and Country Blvd. (Suite 300)
Houston, Texas, 77024

WWW.TARGETEMISSION.COM

Report Generated on: Sep 16, 2019

TARGET EMISSION SERVICES

Company:	Dominion		Report:	Annual LDAR		
District:	DETI-Eastern		Regulation(s):	NSPS Subpart OOOOa		
Facility Name:	Leesburg - LDAR		Report Date:	Sep 16, 2019		
GPS Coord.	39.000170	-77.597539	Period:	2018-Aug-02	TO	2019-Aug-01

This report satisfies the requirements of 40 CFR §60.5420a(b)(7) for the collection of fugitive emissions components at the above referenced compressor station.

Information required to be reported per §60.5420a(b)(7)(i) - (vi)

Monitoring Quarter	Q4	Q1	Q2	Q3	
Survey Start Date/Time	10/09/2018 10:00 AM	02/12/2019 10:00 AM	04/25/2019 10:00 AM	survey conducted after report date	
Survey End Date/Time	10/09/2018 1:30 PM	02/12/2019 2:30 PM	04/25/2019 2:30 PM		
OGI Technician (see Appendix for OGI Technician Training and Experience)	Andrew Sheffler	Justin Vecchio	Evan Musselman		
Ambient Temp. (°F)	74	33	56		
Sky Conditions	Mostly Cloudy, 50%-90% sky is clouds	Overcast, >90% of the sky is covered by clouds	Mostly Cloudy, 50%-90% sky is clouds		
Max. Wind Speed (MPH)	2	8	1		
LDAR Instrument	Optical Gas Imaging/GFX-320	Optical Gas Imaging/GFX-320	Optical Gas Imaging/GFX-320		
§60.5420a(b)(7)(vi) Deviations from Monitoring Plan	No deviations from the Monitoring Plan	No deviations from the Monitoring Plan	No deviations from the Monitoring Plan		
Deviation(s) Explanation	N/A	N/A	N/A		

§60.5420a(b)(7)(vii) - Number and type of components for which fugitive emissions were detected

Valves	5	1			
Connectors	7		8		
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters	1				
Other	1				
Total No. of Leaks Detected	14	1	8		

§60.5420a(b)(7)(viii) - Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h)

Valves					
Connectors					
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					

§60.5420a(c)(15)(ii)(I)(7) – Number and type of components that were tagged as a result of not being repaired during the monitoring survey as required in §60.5397a(h)(3)(ii).

Valves	5	1			
Connectors	7		8		
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters	1				
Other	1				

§60.5420a(b)(7)(ix) - Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored

Valves					
Connectors					
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					

§60.5420a(b)(7)(x) - Date of successful repair of the fugitive emission component (see Repair List).
§60.5420a(b)(7)(xi) - Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair (see DOR List).
§60.5420a(b)(7)(xii) - Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding (see Repair List).

TARGET EMISSION SERVICES

Fugitive Emissions Components Placed on DOR

This summary satisfies the annual reporting requirements of §60.5420a(b)(7)(xi), "number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair".

Component					
Quarter	**Q4**	**Q1**	**Q2**	**N/A**	**N/A**
Survey Date	**10/09/18**	**02/12/19**	**04/25/19**		
Valves	1				
Connectors			2		
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					
Total No. of Leaks on DOR	3				

Date Surveyed	Emission ID #	Component Type	Current Repair Status	Delay of Repair Explanation / Justification
2018-10-09	25510291	Valve	Repaired	Shutdown required
2019-04-25	26410099	Connector	Delay of Repair	Shutdown required
2019-04-25	26410100	Connector	Delay of Repair	Shutdown required

Fugitive Emissions Components Repaired During Reporting Period

This summary satisfies the annual reporting requirements of §60.5420a(b)(7)(x), "date of successful repair of the fugitive emission component" and §60.5420a(b)(7)(xii), "type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding".

Date Surveyed	Emission ID #	Date of Successful Repair	Repair Confirmation Method / Instrument
2018-10-09	25510282	2018-Oct-19	Snoop
2018-10-09	25510283	2018-Oct-19	Snoop
2018-10-09	25510284	2018-Oct-19	Snoop
2018-10-09	25510285	2018-Oct-19	Snoop
2018-10-09	25510287	2018-Oct-19	Snoop
2018-10-09	25510288	2018-Oct-19	Snoop
2018-10-09	25510289	2018-Oct-19	Snoop
2018-10-09	25510290	2018-Oct-19	Snoop
2018-10-09	25510292	2018-Oct-19	Snoop
2018-10-09	25510286	2018-Oct-22	Snoop
2018-10-09	25510293	2018-Oct-26	Snoop
2018-10-09	25510294	2018-Oct-26	Snoop
2018-10-09	25510295	2018-Oct-26	Snoop
2018-10-09	25510291	2018-Dec-13	Snoop
2019-02-12	26310030	2019-Feb-19	Snoop
2019-04-25	26410098	2019-May-01	Snoop
2019-04-25	26410102	2019-May-01	Snoop
2019-04-25	26410096	2019-May-06	Snoop
2019-04-25	26410097	2019-May-06	Snoop
2019-04-25	26410101	2019-May-21	Snoop
2019-04-25	26410110	2019-May-22	Snoop

OGI Technician Training and Experience

Monitoring surveys are performed by personnel that are trained in the proper operation of the OGIC (Optical Gas Imaging Camera) to be used in the monitoring survey and that have prior experience using OGICs for the purposes of identifying fugitive emissions. Additionally, monitoring personnel are familiar with the types of equipment located at a natural gas compressor station. All monitoring personnel review each site specific monitoring plan prior to performing monitoring surveys at the Facility.

All Monitoring Technicians follow a protocol containing technical procedures, training requirements, and individual and team performance audits. This protocol ensures that each crew member follows a prescriptive training program. The training program includes minimum required field times for each module. Each module uses both written testing and on-site work performance audits to evaluate the crew member on their work performance.

Each crew member must successfully complete their training modules to be allowed to work as a member of the main field crew. The protocol also includes an audit program to evaluate work performance on an on-going basis. This system ensures that each crew member is adhering to the procedures and guidelines of the protocol.

Each monitoring technician:

1) holds a strong knowledge of oil and gas operations and has a detailed understanding of the various processes that are involved in the transportation and processing on natural gas.
2) is trained (certified) and experienced in the use of fugitive emission detection and measurement equipment;
3) has a minimum of 1000 hours of experience on the use of optical gas imaging, ultrasonic leak detection and emission flow rate measurement
4) maintains required safety training and strong understanding of applicable TARGET Safe Operating Procedures; and
5) received performance audits to ensure compliance to our prescriptive fugitive emission assessment protocol

The protocol contains technical procedures, training requirements, and individual and team performance audits. The purpose of our assessment protocol is to:

1) Maintain a high degree of Quality Control;
2) Ensure that all sources of fugitive emissions are identified;
3) Ensure that all source data is consistently recorded to provide reliable and effective emission reduction recommendations.

This protocol eliminates the common problems and barriers that cause many programs to fail. Our staff are trained and audited to avoid many of the common fugitive emission program problems. Some of these common problems include:

- Inexperienced with camera use and the concepts of infrared thermography
- Not using multiple camera angles
- Constantly moving the camera from scene to scene without pausing in each view to look for gas images
- Many leaks are missed by relying solely on the automatic mode (manual mode can be more effective in certain situations)
- Scanning too fast and missing components

Accurate data collection and entry is crucial to maintaining an effective Fugitive Emission Management Program. The data management protocol includes a data QA/QC review process that contains three levels of evaluation:

1) Technician Self Check – at the end of each assessment the technician must review each emission entry to locate and remediate any data inconsistencies
2) Team Lead Review – at the end of each work day the Team Lead will run a QA/QC evaluation on each assessment and emission to ensure that data has been entered following the TARGET Protocol.
3) Project Manager Evaluation – on a weekly basis the project manager will run all emission data through a QA/QC data evaluation to detect and eliminate any inconsistencies.

OGI Technician Training and Experience

Survey Date	OGI Technician	Certification Date	Months of OGI Experience
2018-Oct-09	Andrew Sheffler	2017-Sep-05	14
2019-Feb-12	Justin Vecchio	2018-Oct-01	5
2019-Apr-25	Evan Musselman	2018-Jul-15	10